

Roopal P. Luhana, Esq.
Eric T. Chaffin, Esq.
CHAFFIN LUHANA LLP
600 3rd Avenue, 12th Floor
New York, New York 10016
(888) 480-1123 telephone
(888) 499-1123 facsimile
luhana@chaffinluhana.com
chaffin@chaffinluhana.com

Attorneys for Plaintiffs

Richard B. North, Jr. (admitted pro hac vice)
Georgia Bar No. 545599
Matthew B. Lerner (admitted pro hac vice)
Georgia Bar No. 446986
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station
201 17th Street, NW, Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com

Attorneys for Defendants
C.R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability MDL No. 2:15-md-02641-PHX-DGC
Litigation

This document related to:

Motta, et al., v. C.R. Bard, Inc. and Bard
Peripheral Vascular, Inc.
Case No. 2:18-cv-02798-DGC

**STIPULATION OF DISMISSAL WITH
PREJUDICE**

Plaintiffs John Motta and Michelle Acevedo-Motta (“Plaintiffs”) and Defendants C.R. Bard, Inc.
and Bard Peripheral Vascular, Inc. (“Defendants”), by and through their undersigned counsel, and
pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii), hereby stipulate to the dismissal of *Motta,*
et al., v. C.R. Bard and Bard Peripheral Vascular, Inc., Case No. 2:18-cv-02798-DGC with prejudice.
Each party to bear their own fees and costs.

1 Dated: March 12, 2021

Respectfully submitted,

2 /s/ Roopal Luhana

3 Roopal P. Luhana, Esq.

4 Eric T. Chaffin, Esq.

5 luhana@chaffinluhana.com

6 chaffin@chaffinluhana.com

7 **CHAFFIN LUHANA LLP**

8 600 3rd Avenue, 12th Floor

9 New York, New York 10016

10 P: (888) 480-1123

11 F: (888) 499-1123

12 *Attorney for Plaintiffs*

13 /s/ Richard North

14 Richard B. North, Jr.

15 Matthew B. Lerner

16 richard.north@nelsonmullins.com

17 matthew.lerner@nelsonmullins.com

18 **NELSON MULLINS RILEY & SCARBOROUGH LLP**

19 201 17th St. NW, Ste. 1700

20 Atlanta, GA 30363

21 P: 404.322.6000

22 F: 404.332.6397

23 *Attorney for Defendants*

CERTIFICATE OF SERVICE

I hereby certify that, on March 12, 2021, the foregoing stipulation to dismiss all claims in this matter with prejudice was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system on all counsel of record.

/s/ Roopal Luhana
Roopal P. Luhana, Esq.